

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:) **Chapter 13**
)
)
Joseph Pabon,) **Case No. 19-14999**
)
)
Debtor.) **Judge A. Benjamin Goldgar**

NOTICE OF MOTION

TO: Office of Marilyn O Marshall
Chapter 13 Trustee
(via Electronic Court Notice)

YOU ARE HEREBY NOTIFIED that on June 18, 2019 at 9:30 a.m. or as soon thereafter as counsel may be heard, the undersigned shall appear before the Honorable Judge Goldgar, or any Judge sitting in his stead, in Courtroom 642 of the Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, Illinois and then and there present the attached Motion to Extend Time to File Remaining Schedules, Plan, and other documents at which time you may appear if you so deem fit.

/s/ David H. Cutler

CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that he caused the above and foregoing Notice and attached Motion to be served on the Trustee via Electronic Court Notice on the June 7, 2019.

/s/ David H. Cutler

Cutler & Associates, Ltd.
4131 Main St.
Skokie, IL 60076
Phone: (847) 673-8600

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**MOTION TO EXTEND TIME TO FILE DEBTOR'S
REMAINING SCHEDULES, PLAN, AND OTHER DOCUMENTS**

NOW COMES the Debtor, Joseph Pabon, by and through his attorneys, Cutler & Associates, Ltd., and move this Court to grant him until June 21, 2019 to file his remaining Schedules, Plan, and other documents. In support of this Motion, the Debtor respectfully states and alleges as follows:

1. The Debtor filed his petition for relief under Chapter 13 of the United States Bankruptcy Code on May 24, 2019.
2. The Debtor's remaining schedules, Plan, and other documents would, in the absence of this Motion, be due on June 7, 2019.
3. The Debtor needs additional time to review the remaining schedules, Plan, and other documents with his attorneys before they can be filed.
4. The Debtor, therefore, requests that he be granted until June 21, 2019 to file his remaining Schedules, Plan, and other documents.

WHEREFORE, the Debtor, Joseph Pabon, prays for the following relief:

- A. That the Debtors be granted until June 21, 2019 to file his remaining schedules, Plan, and other documents; and
- B. For such other and further relief as this Court deems equitable and just.

Respectfully Submitted,

Dated: June 7, 2019

By: _____ /s/ David H. Cutler
One of the attorneys for the Debtor

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Skokie, IL 60076
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